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Attorneys for Plaintiff
10 UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

CR No. 15-00621-R-6

14 Plaintiff,

STIPULATION AND JOINT REQUEST TO
AMEND SENTENCE FOR DEFENDANT
ANTHONY TNGRYAN

15 v.

16 ANTHONY TNGRYAN,

17 Defendant.
18

19 Plaintiff United States of America, by and through its counsel
20 of record, the United States Attorney for the Central District of
21 California and Assistant United States Attorneys Julius J. Nam and
22 Saurish Appleby-Bhattacharjee, and defendant Anthony Tngryan
23 ("defendant"), by and through his counsel of record, Gevork
24 Chilingaryan, hereby stipulate as follows:

25 1. On March 7, 2016, the parties entered into a written plea
26 agreement, pursuant to which defendant pleaded guilty to Count One of
27 the twenty-count indictment in the above-captioned case, which
28 charged defendant with conspiracy to possess fifteen or more

1 unauthorized access devices, in violation of 18 U.S.C. § 1029(b)(2).
2 (ECF No. 174.)

3 2. The statutory maximum sentence for a violation of 18 U.S.C.
4 § 1029(b)(2) is: five years' imprisonment; a fine of \$250,000 or
5 twice the gross gain or gross loss resulting from the offense,
6 whichever is greatest; a three-year period of supervised release; and
7 a mandatory special assessment of \$100.

8 3. On May 23, 2016, defendant appeared for sentencing before
9 the Court. The Court sentenced defendant to 18 months' imprisonment,
10 to be followed by 4 years' supervised release, as well as a mandatory
11 special assessment of \$100 and a waiver of fines.

12 4. The Court's imposition of a 4-year term of supervised
13 release exceeds the statutory maximum term of supervised release for
14 the offense with which defendant was convicted.

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